

1 **SCHIAN WALKER, P.L.C.**

3550 NORTH CENTRAL AVENUE, #1700

2 PHOENIX, ARIZONA 85012-2115

TELEPHONE: (602) 277-1501

3 FACSIMILE: (602) 297-9633

E-MAIL: [ecfdocket@swazlaw.com](mailto:ecfdocket@swazlaw.com)

4 SCOTT R. GOLDBERG, #015082

CODY J. JESS. #025066

5 Proposed Attorneys for Debtors

6 **UNITED STATES BANKRUPTCY COURT**

7 **DISTRICT OF ARIZONA**

8  
9 In re:

10 THORNWOOD FURNITURE  
MANUFACTURING, INCORPORATED,

11 Debtor.

No. 2-10-bk-17750-RJH

CHAPTER 11

**MOTION FOR JOINT ADMINISTRATION**

12  
13 Thornwood Furniture Manufacturing, Incorporated ("**Thornwood**"), and Albacore  
14 Holdings, LLC ("**Albacore**" and with Thornwood, "the "**Debtors**"), pursuant to Rule 1015(b)(4),  
15 Federal Rules of Bankruptcy Procedure, request that this bankruptcy case be jointly administered with  
16 the bankruptcy case of *In re Albacore Holdings, LLC*, No. 2-10-bk-17754-SSC. In support of this  
17 *Motion for Joint Administration* ("**Motion**"), the Debtors represent the following:

18 1. On June 7, 2010, the Debtors filed voluntary petitions under Chapter 11 of the  
19 Bankruptcy Code. The Albacore case is proceeding before the Honorable Sarah S. Curley, while the  
20 Thornwood bankruptcy case is before this Court.

21 2. Thornwood is in the business of manufacturing retail and commercial furniture,  
22 while Albacore owns the real property upon which Thornwood operates. The Debtors share common  
23 ownership, corporate officers and share the same single secured creditor, M&I Marshall & Ilsley Bank  
24 ("**M&I**"). M&I alleges that the loans it made to the Debtors are cross-defaulted and cross-collateralized.  
25 The reorganization of one debtor is dependent upon the reorganization of the other debtor, and both  
26 Debtors intend to restructure their obligations to M&I under a joint plan of reorganization.

3. The cost to creditors, if the cases are jointly administered, will be substantially decreased by avoiding duplicate notices and mailings to creditors and duplicate pleadings in all cases.

4. The Debtors have noticed this Motion to the Office of the United States Trustee, creditors, and other interested parties as listed on the Debtors' master mailing lists. The Debtors propose to give notice of the entry of an order approving this Motion in the form attached hereto as Exhibit "A."

WHEREFORE, the Debtors respectfully request that the Court order the joint administration of Thornwood Furniture Manufacturing, Incorporated, and Albacore Holdings, LLC under the case Thornwood Furniture Manufacturing, Incorporated, No. 2:10-bk-17750-RJH, under the following caption:

In re:  
THORNWOOD FURNITURE  
MANUFACTURING, INCORPORATED,  
Debtor.

No. 2-10-bk-17750-RJH  
No. 2-10-bk-17754  
(Jointly Administered)  
CHAPTER 11

In re:  
ALBACORE HOLDINGS, LLC,  
Debtor.

DATED this 8th day of June, 2010.

SCHIAN WALKER, P.L.C.

By /s/ CODY J. JESS, #025066  
Scott R. Goldberg  
Cody J. Jess  
Proposed Attorneys for Debtors

1 COPY of the foregoing  
2 e-mailed this 8th day  
of June, 2010, to:

3 Edward K. Bernatavicius, Esq.  
4 U.S. Trustee's Office  
5 230 North First Avenue, #204  
Phoenix, Arizona 85003-1706  
[edward.k.bernatavicius@usdoj.gov](mailto:edward.k.bernatavicius@usdoj.gov)

6 Brian Sirower, Esq.  
7 Michael Migliaccio, Esq.  
8 Quarles & Brady, LLP  
Two North Central Avenue  
Phoenix, Arizona 85004-2391  
Attorneys for M&I Marshall & Ilsley Bank  
[bsirower@quarles.com](mailto:bsirower@quarles.com)  
[michael.migliaccio@quarles.com](mailto:michael.migliaccio@quarles.com)

10 and COPY mailed to:

11 Debtors' List of 20 Largest  
12 Unsecured Creditors

13 /s/ DEBBI STEPHENS

14 140426.5

# EXHIBIT "A"

1 **SCHIAN WALKER, P.L.C.**

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6 **UNITED STATES BANKRUPTCY COURT**

7 **DISTRICT OF ARIZONA**

8 In re:

9 THORNWOOD FURNITURE  
10 MANUFACTURING, INCORPORATED,

11 Debtor.

No. 2-10-bk-17750-RJH

No. 2-10-bk-17754

(Jointly Administered)

CHAPTER 11

12 In re:

13 ALBACORE HOLDINGS, LLC,

14 Debtor.

**ORDER APPROVING MOTION FOR  
JOINT ADMINISTRATION**

15  
16 Thornwood Furniture Manufacturing, Incorporated and Albacore Holdings, LLC, debtors  
17 and debtors-in-possession in the above-referenced Chapter 11 proceedings (the "**Debtors**"), having filed  
18 their *Motion for Joint Administration* (the "**Motion**"), and good cause appearing,

19 IT IS HEREBY ORDERED that the Motion is approved and the cases will be jointly  
20 administered under the first-filed case: Thornwood Furniture Manufacturing, Incorporated, Case No.  
21 2:10-bk-17750-RJH.

22 IT IS FURTHER ORDERED that the Debtors shall provide notice of the Motion to all  
23 creditors and parties-in-interest, with opportunity to object, pursuant to Rule 2002, Federal Rules of  
24 Bankruptcy Procedure.

25 IT IS ORDERED directing the Clerk of the Court to jointly administer the above-  
26 captioned bankruptcy cases so that all pleadings and documents filed in these cases, including in any

adversary proceeding, or contested matter, be filed under Case No. 2:10-bk-17750-RJH, using the above caption.

IT IS FURTHER ORDERED directing proposed counsel for the Debtors to file a consolidated master mailing list containing the names and addresses of the creditors in each bankruptcy case.

IT IS FURTHER ORDERED that unless an objection to the entry of this Order is timely made, this Order approving joint administration shall become final.

DATED AND SIGNED ABOVE.

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